

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, Both  
individually and as Legal Guardian of  
Shane Allen Loveland; and JACOB  
SUMMERS

CASE NO. 8:18CV127

Plaintiff(s),

v.

THE GOODYEAR TIRE & RUBBER  
COMPANY

Defendant(s).

---

**PLAINTIFFS' RESPONSE TO GOODYEAR'S MOTION IN LIMINE TO PROHIBIT  
USE OF DISCOVERY IN OTHER LITIGATION**

Plaintiffs submit this Response to Goodyear's Motion in Limine to prohibit use of discovery in other litigation.

**I.**

Plaintiffs do not intend to offer any discovery materials or depositions from other litigation which has not been specifically disclosed in this case. If it became necessary for some reason to offer materials or testimony which had not been disclosed in this case, Plaintiffs would approach the bench.

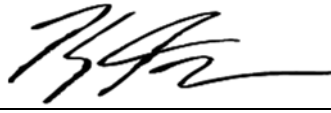
**II.**

The parties reached agreement regarding the use of certain depositions taken in prior Goodyear lawsuits. Plaintiff does not object to Goodyear's proposal to redact the case name from the transcripts.

Respectfully Submitted,

KAster, LYNCH, FARRAR & BALL, L.L.P.

Dated: February 11, 2020

By 

Kyle Wayne Farrar (Pro Hac Vice)  
Texas Bar No. 24038754  
Wesley Todd Ball (Pro Hac Vice)  
1117 Herkimer Street  
Houston, TX 77008  
(713) 221-8300 (Telephone)  
(713) 221-8301 (Facsimile)  
Email: [kyle@fbtrial.com](mailto:kyle@fbtrial.com)

*and*

Paul E. Godlewski (#35567)  
SCHWEBEL GOETZ & SIEBEN, P.A.  
5120 IDS Center  
80 South Eighth Street  
Minneapolis, Minnesota 55402-2246  
612-377-7777 (Telephone)  
612-333-6311 (Facsimile)  
Email: [pgodlewski@schwebel.com](mailto:pgodlewski@schwebel.com)

*and*

Michael F. Coyle  
FRASER, STRYKER LAW FIRM  
409 South 17<sup>th</sup> Street  
Ste. 500, Energy Plaza  
Omaha, Nebraska 681025  
(402) 341-6000 (Telephone)  
(402) 341-8290 (Facsimile)  
[mcoyle@fraserstryker.com](mailto:mcoyle@fraserstryker.com)

CERTIFICATE OF SERVICE (CM/ECF)

I HEREBY CERTIFY that on February 11, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

Edward S. Bott, Jr  
Clark W. Hedger  
Juliane M. Rodriguez  
10 South Broadway, Ste 2000  
St. Louis, MO 63102  
[esb@greensfelder.com](mailto:esb@greensfelder.com)  
[chl@greensfelder.com](mailto:chl@greensfelder.com)  
[jrodriguez@greensfelder.com](mailto:jrodriguez@greensfelder.com)

Jennifer D. Tricker  
1700 Farnam Street, Ste 1500  
Omaha, NE 68102  
[jtricker@bairdholm.com](mailto:jtricker@bairdholm.com)

*Attorneys for Defendant Goodyear Tire & Rubber Company*